

## **Major Changes to the revised Draft General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems**

The revised Draft General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer System (MS4s) Permit remains much the same from the original draft in that the basis of the permit are the six minimum control measures. The major modifications include changes to post-construction requirements, deletion of Receiving Water Limitations, and clarification to the monitoring requirements.

Although a post-construction program is still required, as outlined by U.S. EPA in the regulations, the previous draft provided an example of structural best management practices that a municipality may require developers to include in projects, including the provision that runoff from an 85% storm event be captured and/or treated. The previous draft required a plan that was at least as stringent as the example for municipalities subject to high growth or potential growth, or serves more than 50,000 people. Although a similar plan may still be the most appropriate for certain communities, the revised draft does not include these prescriptive program elements.

The Receiving Water Limitations have been removed from the permit for this first permit cycle. The revised draft assumes that implementation of the six minimum measures will protect water quality, and this assumption is consistent with U.S. EPA's regulations. Additionally, the revised draft permit clarifies the monitoring requirements. Chemical monitoring is not required by this statewide General Permit, but may be required by the applicable regional water quality control board.